

United States District Court
SOUTHERN **DISTRICT OF** **TEXAS**
McALLEN DIVISION

UNITED STATES OF AMERICA **CRIMINAL COMPLAINT**

V.

Jermel Marlene Snell **Case Number:**
United States **YOB:** **1993** **United States District Court**
Southern District of Texas **FILED** **M-16- 1289 -M**

JUL 06 2016

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about July 4, 2016 in Hidalgo County, in the Southern District of Texas defendants(s) did,

(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Yesica Selena Perez-De Delgado, citizen and national of El Salvador, along with eight (8) other undocumented illegal aliens, for a total of nine (9), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said alien in furtherance of such violation of law within the United States, that is, from a location near Mission, Texas to the point of arrest near Mission, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) **FELONY**
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On July 4, 2016, at approximately 4:45 pm, a concerned citizen called McAllen Station and reported a black Honda loading up illegal aliens near La Lomita in Mission, Texas. La Lomita is located within a quarter mile of the Rio Grande River, south of the levee. In order to drive to La Lomita, it is a one way in, one way out, via the levee. Typically, there is very little vehicular traffic on that part of the levee, other than law enforcement.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

Yes No

Signature of Complainant

Approved by

R. EJ

Sworn to before me and subscribed in my presence,

July 6, 2016

Date

Dorina Ramos **U. S. Magistrate Judge**
Name and Title of Judicial Officer

Adan De Los Santos **Senior Patrol Agent**
Printed Name of Complainant

at **McAllen, Texas**
City and State

Dorina Ramos
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-16- 1289 -M

RE: Jermel Marlene Snell

A209 237 034

CONTINUATION:

Agent S. Beckman was close to La Lomita, and responded within seconds. Agent Beckman saw a small black SUV driving east, away from La Lomita, toward the only exit available. Agent Beckman pulled onto the levee, blocking the vehicle's exit. As the vehicle drove closer to Agent Beckman, he could see that the vehicle was a Hyundai, as opposed to a Honda, as the caller had stated. The driver, later identified as Jermel Marlene SNELL, stopped in front of Agent Beckman. She was on the phone, and appeared nervous as Agent Beckman approached her.

Agent Beckman saw several subjects crowded in the back of the car. He questioned everyone in the car as to their citizenship. The driver claimed to be a United States Citizen, and the 9 passengers all claimed to be illegally in the United States.

All 10 people were transported to the McAllen Station for processing.

PRINCIPAL'S STATEMENT:

Jermel Marlene SNELL was read her rights. She stated she was willing to provide a statement without the presence of an attorney.

SNELL told agents she knew the people she picked up were illegal, but she did it so she could buy fireworks for her kids. According to SNELL, another lady owed her some money, so that lady gave her the phone number to a smuggler so that she could earn some of that money back. The smuggler told her she was supposed to pick up 2 or 3 illegal aliens, but when she arrived, too many people came out of the brush. She had to send some back to the brush, because they didn't fit in her car. SNELL told agents she was going to be paid \$120 (USD) per person she transported.

MATERIAL WITNESS'S STATEMENT:

Yesica Selena Perez-De Delgado was read her rights. She stated she was willing to provide a statement without the presence of an attorney.

Perez, a citizen of El Salvador, claimed her brother paid an unknown amount for her to be smuggled into the United States. After walking through the brush for approximately 25 minutes, a black car drove up and stopped next to them. The guide that was assisting them pointed to the car and told the group to board. Perez stated there was only one car in the area.